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Texas Commission on Environmental Quality
Air Quality Division
Implementation Grants Section, MC-204
P.O. Box 13087
Austin, TX 78711-3087

Re: City of Arlington's comments on *Volkswagen Settlement Draft Beneficiary Mitigation Plan*

Dear Chairman Niermann:

On behalf of the City of Arlington and as member the Regional Transportation Council for the North Texas Council of Governments, I submit this letter as Arlington's formal comments on the Draft Beneficiary Mitigation Plan for Texas regarding the Volkswagen settlement. The City of Arlington thanks the Texas Commission on Environmental Quality (TCEQ) for its work in developing this plan.

As the Mayor of Arlington, I take pride in the efforts that the City is making to better the quality of life of its residents, and cleaning North Texas air is one way that the City Council is working to make Arlington a better place to live, learn, work and play. While the City of Arlington agrees with some of the goals and strategies of the plan, Arlington would like to make comments on the proposed funding allocation to the Dallas-Fort Worth (DFW) priority area and grant funding calculations.

Funding allocation to the DFW priority area

The DFW area has been in nonattainment in both the 2008 and 2015 ozone NAAQS levels for years, and thus adequately funding this area would make a positive impact in bettering the area's air quality. As the DFW priority area consists of 11 counties, more than any other designated metropolitan area, DFW's demand for additional funding is greater than most of the other regions. No matter what calculation is used for funding allocation calculations, whether that be population, number of registered violating vehicles, vehicle miles traveled, NOx Emissions, VOC emissions or heavy-duty diesel vehicles eligible for replacement/repair, the DFW area shares a larger percentage of the burden among the other priority areas than the proposed 15% allocation of funds suggests.

In order to mitigate years of nonattainment levels in DFW, a large investment is needed to create systematic change and cultural shift that will lead to lower NOx levels. The current funding proposal of \$29 million is much lower than what is needed to create this change and should be

increased to a level that is reflective of the relative needs of priority areas and the impact that it would make in the lives of residents in those areas.

Grant Funding Calculations

As local governments take on a greater proportion of infrastructure costs, they have had to diversify their revenue sources to meet these needs. Because of this, including other revenue sources available to local governments when granting mitigation plan funding further binds municipal resources. By considering only mitigation plan funding for requested projects and not additional funding that the State may provide as a substitute, the TCEQ can better ensure that those projects are making the necessary strides toward reducing carbon emissions instead of satisfying requirements from other revenue sources. Furthermore, innovative cities and projects should not be punished for leveraging other revenue sources to better their area's air quality.

The City of Arlington requests that you reconsider both the DFW funding allocation and grant funding calculations in the draft Beneficiary Mitigation Plan for Texas. If you have any questions or would like to discuss these points in greater detail, please contact Alexa Aragonez, Senior Management Analyst of Communication and Legislative Affairs at (817)-459-6347 or alex@cityofarlington.com. I appreciate your consideration of these comments and hope to collaborate with your staff soon.

Respectfully,



Jeff Williams
Mayor
City of Arlington

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